

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**DECLARATION OF KEVIN GANNON
IN SUPPORT OF PLAINTIFF’S MOTION TO COMPEL
INSPECTION, TESTING, AND SOURCE CODE OF THE ACCUSED PRODUCTS**

I, Kevin Gannon, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for the plaintiff in this action, Singular Computing LLC (“Singular”). I submit this declaration in support of Singular’s motion to compel inspection, testing, and source code of the accused products.

2. Attached hereto as Exhibit F is a true and correct copy of two pages of the 2020 Annual Report of Alphabet Inc.

3. Attached hereto as Exhibit G is a true and correct copy of three pages downloaded from www.macrotrends.net on August 12, 2021.

4. Attached hereto as Exhibit H is a true and correct copy of two pages downloaded from www.google.com on August 12, 2021.

5. **[SEALED]** Attached hereto as Exhibit I is a true and correct copy of a letter from Deeva Shah to Kevin Gannon dated March 1, 2021.

6. Attached hereto as Exhibit J is a true and correct copy of an email from Kevin Gannon to Deeva Shah *et al.* dated July 16, 2021.

6. Attached hereto as Exhibit K is a true and correct copy of an email from Deeva Shah to Kevin Gannon dated July 19, 2021.

7. Attached hereto as Exhibit L is a true and correct copy of an email from Kevin Gannon to Deeva Shah *et al.* dated July 20, 2021.

8. **[SEALED]** Attached hereto as Exhibit M is a true and correct copy of an email from Brian Seeve to Anna Porto *et al.* dated July 21, 2021.

9. **[SEALED]** Attached hereto as Exhibit N is a true and correct copy of an email from Brian Seeve to Matthias Kamber *et al.* dated July 8, 2021.

10. **[SEALED]** Attached hereto as Exhibit O is a true and correct copy of excerpts from the transcript of the deposition of Norman Jouppi taken in this case on July 16, 2021.

11. **[SEALED]** Attached hereto as Exhibit P is a true and correct copy of excerpts from the transcript of the deposition of Jeffrey Dean taken in this case on July 21, 2021.

12. Attached hereto as Exhibit Q is a true and correct copy of excerpts from the transcript of the June 30, 2021 Motion Hearing in this case.

13. The foregoing is true and correct to the best of my current knowledge.

Executed under the pains and penalties of perjury of the United States of America at Boston, Massachusetts on August 13, 2021.

/s/ Kevin Gannon